

Robert Roos
Arizona Bar No. 009915
LEWIS ROCA ROTHGERBER CHRISTIE LLP
201 E. Washington Street, Suite 1200
Phoenix, AZ 85004
Tel: (602) 262-5311
Email: rroos@lewisroca.com
(Admitted pro hac vice)

Adrienne Brantley-Lomeli
Nevada Bar No. 14486
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996
Tel: (702) 949-8200
Email: abrantley-lomeli@lewisroca.com

*Attorneys for Defendants JE Dunn Construction
Company, Federal Insurance Company, Hartford
Fire Insurance Company, Travelers Casualty
and Surety Company of America and Pacific Indemnity Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, for the use
and benefit of SUSTAINABLE MODULAR
MANAGEMENT, INC., a Texas corporation,

Plaintiff,

vs.

JE DUNN CONSTRUCTION
COMPANY; FEDERAL INSURANCE
COMPANY; HARTFORD FIRE
INSURANCE COMPANY; TRAVELERS
CASUALTY AND SURETY COMPANY
OF AMERICA; DOE Individuals I-X and
ROE Entities I-X, inclusive,

Defendants.

And All Related Matters

Case No.: 2:20-cv-00790-^{GMN}~~JAD~~-NJK
Consolidated with
Case No.: 2:20-cv-01200-APG-VCF

**JOINT MOTION TO EXTEND TIME
TO FILE JOINT PROPOSED
PRETRIAL ORDER**

(First Request)

Pursuant to LR IA 6-1, Plaintiff, United States of America, for the Use and Benefit of Sustainable Modular Management, Inc. ("SMM"), Defendant/Counterclaimant JE Dunn Construction Company ("JE Dunn"), and Defendants Federal Insurance Company; Hartford Fire

Insurance Company; Travelers Casualty And Surety Company Of America (collectively “the Surety Defendants”) jointly move the Court to extend the time for the Parties to file a jointly proposed pretrial order from April 22, 2024, to August 23, 2024 (59 days after the June 25, 2024 settlement conference), and in support thereof, respectfully state as follows:

1. In its March 21, 2024 Order Granting Motion for Partial Summary Judgment (ECF 127), the Court ordered the parties to file a jointly proposed pretrial order pursuant to LR 16-3(b) within thirty days from the date of that order (which would be April 22, 2024 accounting for April 20 falling on a Saturday).

2. The following day, on March 22, 2024, the Court set a settlement conference for June 25, 2024.

3. The preparation of a jointly proposed pre-trial order in this complex matter will consume substantial client resources and attorney time, but the jointly proposed pre-trial order will be unnecessary if the settlement conference results in a settlement of this matter.

4. A close family member of counsel for JE Dunn and the Surety Defendants is dealing with a serious health issue which is requiring the time and attention of JE Dunn’s counsel. Even if the Court had not set a settlement conference in June, counsel for JE Dunn would require an extension of the April 22, 2024 proposed pretrial order filing deadline for this reason.

5. The Parties jointly request an extension of the time within which to file their jointly proposed pre-trial order until August 23, 2024, 59 days after the June 25, 2024 settlement conference. The parties request more than 30 days because of the complexity of the case, the time both counsel anticipate will be required to prepare the jointly proposed pretrial order, and to accommodate summer vacation plans in July.

...

...

...

...

...

...

6. This Motion is made in good faith and not to delay the trial preparation process.
This is the Parties' first request for an extension of this deadline.

DATED this 29th day of March 2024.

VerisLaw, PLLC

By: /s/ Michael S. Alfred
Michael S. Alfred (*pro hac vice*)
State Bar No. 24014416
4843 Colleyville Boulevard, Suite 252-391
Colleyville, Texas 76034
(817) 678-4121 telephone
(512) 717-7230 fax
malfred@verislaw.net

MORRIS LAW GROUP

Steve Morris, Bar No. 1543
Rosa Solis-Rainey, Bar No. 7921
801 S Rancho Drive, Suite B4
Las Vegas, Nevada 89106

*Attorneys for Plaintiff/Counterdefendant
Sustainable Modular Management, Inc.*

Lewis Roca Rothgerber Christie LLP

By: /s/ Adrienne Brantley-Lomeli
Adrienne Brantley-Lomeli, Bar No. 14486
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

*Attorneys for Defendant/Counterclaimant
JE Dunn Construction Company and Surety
Defendants*

ORDER

IT IS SO ORDERED.


United States District Court Judge

DATED March 29, 2024